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10 Attorneys for Plaintiffs

11 UNITED STATES DISTRICT COURT
12 FOR THE DISTRICT OF NEW JERSEY
13

14 JUDY LARSON, BARRY HALL, JOE
15 MILLIRON, TESSIE ROBB, WILLIE
DAVIS, ROMAN SASIK, DAVID
16 DICKY et al., individually and on
behalf of others similarly situated,

17 Plaintiffs,

18 vs.
19

20 AT&T MOBILITY LLC f/k/a
CINGULAR WIRELESS LLC, and
21 SPRINT NEXTEL CORPORATION and
SPRINT SPECTRUM L.P. d/b/a
22 SPRINT NEXTEL and NEXTEL
FINANCE COMPANY

23 Defendants.
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Civil Action No. 07-05325 (JLL)

Hon. Judge Jose L. Linares

**MEMORANDUM OF POINTS
AND AUTHORITIES IN
SUPPORT OF MOTION FOR
ADMISSION PRO HAC VICE OF
GIUSEPPE JOSEPH
ANTONELLI AT FINAL
APPROVAL HEARING**

Date: June 29, 2010

Time: 2:00 p.m.

Dept.: MLK5D

Action Filed:

1 **I. INTRODUCTION.**

2 The applicant, Giuseppe Joseph Antonelli, has met all requirements and
3 conditions set forth in United States District Court for the State of New Jersey,
4 Local Civil Rule 101.1(c)(1) and, therefore, is qualified to appear in this Court on
5 behalf of the plaintiffs in the matter on behalf of the Dias v. AT&T, Los Angeles
6 Superior Court Case No. BC316195 plaintiffs.

7 **II. LEGAL AUTHORITIES.**

8 Local Rule 101.1(c) sets forth the conditions to be admitted as pro hac vice
9 counsel in the United States District, and they are as follows:

10 (1) Any member in good standing of the bar of any court of the
11 United States or of the highest court of any state, who is not under
12 suspension or disbarment by any court and is ineligible for admission
13 to the bar of this Court under L.Civ.R. 101.1(b), may in the discretion
14 of the Court, on motion, be permitted to appear and participate in a
15 particular case. The motion shall contain a certified statement of the
16 applicant disclosing each bar in which the applicant is a member in
17 good standing including the year of admission and the name and
18 address of the official or office maintaining the roll of such members
19 of its bar; in lieu thereof, the motion may attach a certificate of good
20 standing issued by the person or office maintaining the roll of the
21 members of its bar. The motion shall contain a statement certifying
22 that no disciplinary proceedings are pending against the attorney in
23 any jurisdiction and no discipline has previously been imposed on the
24 attorney in any jurisdiction. If discipline has previously been imposed
25 within the past five years, the certification shall state the date,
26 jurisdiction, nature of the ethics violation and the penalty imposed. If
27 proceedings are pending, the certification shall specify the
28 jurisdiction, the charges and the likely time of their disposition. An
attorney admitted pro hac vice shall have the continuing obligation
during the period of such admission promptly to advise the court of
the disposition made of pending charges or of the institution of new
disciplinary proceedings.

(2) The order of the Court granting a motion to appear pro hac vice
shall require the out-of-state attorney to make a payment to the New
Jersey Lawyers' Fund for Client Protection as provided by New Jersey
Court Rule 1:28-2(a). This payment shall be made for any year in
which the admitted attorney continues to represent a client in a matter
pending in this Court. A copy of the order shall be forwarded by the
Clerk to the Treasurer of the Fund.

(3) The order of the Court granting a motion to appear pro hac vice

1 shall require the out-of-state attorney to make a payment of \$150.00
2 on each admission payable to the Clerk, USDC.

3 Mr. Antonelli meets all the requirements set forth in Local Rule
4 101.1(c). He is an attorney licensed to practice before all courts of the State
5 of California. Mr. Antonelli is the managing partner at the Law Office of
6 Joseph Antonelli.

7 In addition, Giuseppe Joseph Antonelli is not a resident of the State
8 of New Jersey. Further, Mr. Antonelli designees Alan T. Friedman and
9 Ricky Bagolie as active members of the State Bar of New Jersey to act as
10 local counsel in this matter. The Court, Class Counsel, and opposing
11 counsel can readily communicate with the firm's office in Jersey City, New
12 Jersey regarding this matter.

13 In addition to the foregoing, Giuseppe Joseph Antonelli is in good
14 standing with all courts in which he is admitted to practice, and he has not
15 been suspended or disbarred in any court.

16 **III. CONCLUSION**

17 The applicant, Giuseppe Joseph Antonelli, has met all requirements
18 and conditions set forth in United States District Court of New Jersey, Local
19 Rule 101.1(c). Therefore, the Dias plaintiffs respectfully requests that Mr.
20 Antonelli be admitted to appear in this Court on behalf of the Dias plaintiffs
21 as counsel pro hac vice.

22 Dated: June 22, 2010

BAGOLIE FRIEDMAN LLC

23
24 By:


25 Ricky Bagolie
26 Alan T. Friedman
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